



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 11, 2022

MEMO ENDORSED

By ECF and Email

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

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| DOCUMENT |
| ELECTRONICALLY FILED |
| DOC #: |
| DATE FILED: 10/17/22 |

Re: *United States v. Danzel Mackins, et al.*, S2 21 CR 424 (LAK)

Dear Judge Kaplan,

The Government submits this letter in advance of the conference scheduled for tomorrow, October 12, 2022 at 4:30 PM to request respectfully, with the consent of the defendants, the extension of the date for the Government to complete provision of discovery in its possession from today, October 11, 2022, to October 17, 2022. Following the unexpected and extended absence of the undersigned representative of the Government during the past month, the Government has assembled that discovery and anticipates requiring only the balance of this week to load it on external drives received from counsel. At this time, the Government does not anticipate obtaining any further data extracted from any device seized to date, and therefore expects discovery to complete at present with the forthcoming production. Separately, at the conference scheduled for tomorrow, the Government will affirm that it takes no position with respect to the request of Defendants Danzel Mackins and Darrin Samuels to stay pre-trial motion practice pending a decision from the Government as to whether or not the Government will seek the death penalty in this case. The Government apologize for having not communicated its lack of a position on a timely basis. Finally, the Government also expects to provide an update concerning the status of Defendant Brandon Wilkins, who was taken into custody in the Commonwealth of Virginia on

SO ORDERED

LEWIS A. KAPLAN, USDJ

Granted

[Signature]
10/12/22

October 6, 2022 on the outstanding warrant issued there for his arrest and remains detained according to the state counterparts of the Government.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: Thomas John Wright

Thomas John Wright
Assistant United States Attorney
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cc: Lauren Blackford (United States Probation Office) (by email)
Joshua Rothman (United States Pretrial Services Office) (by email)
Esere Onaodowan and Karloff Commissiong (Counsel to Danzel Mackins) (by ECF)
Lisa Scolari and Natali Todd (Counsel to Darrin Samuels) (by ECF)
César de Castro (Counsel to Defendant Jamel Williams) (by ECF)
Donald Yanella (Counsel to Defendant Brandon Wilkins) (by ECF)